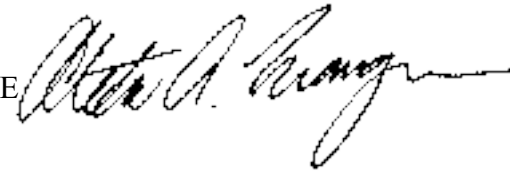


UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION



UNITED STATES OF AMERICA

v.

ALEKSANDAR KUNKIN

No. 3:12-00169  
Judge Trauger

MOTION TO STAY PRETRIAL MOTION FILING DEADLINE

Comes now the Defendant, through counsel, and moves this Honorable Court to stay the pretrial motion filing deadline. Counsel states that the discovery in this case is voluminous, and includes a CD with hundreds of pages of documents, photographs, etc., some of which have to be translated into the client's language. Once the documents are translated and provided to the client, additional time will be needed to meet with the client to review and analyze the discovery, and to determine whether pretrial motions need to be filed. Counsel will notify the Court once this process has been completed. Assistant U.S. Attorney Byron Jones has no objection to this motion.

Respectfully submitted,

s/ C. Douglas Thoresen

C. DOUGLAS THORESEN (BPR #004012)  
Assistant Federal Public Defender  
810 Broadway, Suite 200  
Nashville, TN 37203  
615-736-5047

CERTIFICATE OF SERVICE

I hereby certify that on the 27<sup>th</sup> day of September, 2012, I electronically filed the foregoing Motion for Extension of Time to File Pretrial Motions with the clerk of the court by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Byron Jones, Assistant United States Attorney, 110 Ninth Avenue South, Suite A961, Nashville, TN 37203.

s/ C. Douglas Thoresen

C. DOUGLAS THORESEN